

MEMO ENDORSED**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 6/16/2022

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Kara Elizabeth Black, *on behalf of herself and others
similarly situated in the proposed FLSA Collective Action,*

Plaintiff,

-against-

Cakor Restaurant, Inc., Bridge Cafe Inc., Ismet Sujak,
and Sultania Sujak,

Defendants.

Index No.: 1:22-cv-01447

Hon. District Judge
Valerie E. Caproni

NOTICE OF MOTION

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PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated June 16, 2022, together with the supporting affidavit of Kara Elizabeth Black (the “Black Aff.”), and the exhibit annexed thereto, the supporting affidavit of Ard Puka (the “Puka Aff.”), and the exhibit annexed thereto, and the supporting declaration of Jason Mizrahi (the “Mizrahi Decl.”), and the exhibits annexed thereto, Plaintiff Kara Elizabeth Black (the “Plaintiff”), by and through his attorney Levin-Epstein & Associates, P.C. will move this Court, the Honorable Judge Valerie E. Caproni presiding, for an order: (i) restraining Defendants Cakor Restaurant, Inc., Bridge Cafe Inc., Ismet Sujak, and Sultania Sujak (collectively, the “Defendants”) from, *inter alia*, further harassing, intimidating, and/or retaliating against Plaintiff, in any form pursuant to Federal Rule of Civil Procedure (“Fed.R.Civ.P.”) 65; (ii) granting Plaintiff leave to file a first amended complaint, pursuant to Fed.R.Civ.P. 15(a)(2); and (iii) for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served on or before June 30, 2022, and Plaintiff’s reply must be served on or before July 8, 2022.

Dated: New York, New York
June 16, 2022

Respectfully Submitted,

LEVIN EPSTEIN & ASSOCIATES, P.C.

/s Jason Mizrahi

Jason Mizrahi, Esq.

Joshua Levin-Epstein, Esq.

60 East 42nd Street, Suite 4700

New York, NY 10165

Attorneys for Plaintiff

Cc: All parties via ECF

The Court adopts Plaintiff's proposed briefing schedule. Defendants' deadline to respond is **June 30, 2022**; Plaintiff's reply is due by no later than **July 8, 2022**. If Defendants do not consent to Plaintiff's request to amend the complaint, then the same briefing schedule shall apply. The Court will decide after the motion is fully briefed whether to hold a hearing on the motion.

SO ORDERED.



Date: 6/16/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE